

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>W. R. GRACE &amp; CO., <u>et al.</u></b>	)	<b>Case No. 01-01139 (JKF)</b>
	)	
<b>Debtors.</b>	)	<b>(Jointly Administered)</b>

**NOTICE OF INTENTION TO TAKE DEPOSITION OF  
MR. WILLIAM M. EWING, CIH**

To: ASBESTOS PROPERTY DAMAGE CLAIMANTS AND THEIR ATTORNEYS:

PLEASE TAKE NOTICE that the Debtors will take the deposition upon oral examination of William M. Ewing, CIH, before a person authorized to administer oaths, at the offices of Ogletree Deakins, 600 Peachtree Street, N.E., Suite 2100, Atlanta, Georgia 30308, on Monday, March 26, 2007, commencing at 9:00 AM and continuing from day to day until complete. Mr. Ewing will answer such questions as are propounded to him regarding his expert report(s) that were filed pursuant to the Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims (dated October 13, 2006), scheduling a hearing before Judge Judith K. Fitzgerald on May 30 – 31, 2007, on the lack of hazard issues as described in the 15<sup>th</sup> Omnibus Objections, and related issues. The deposition will be stenographically recorded.

The witness is requested to bring with him and produce any and all documents, writings, data and any other information as referred to in the attached list, Exhibit A.

Counsel is hereby invited to appear and take such part in the examination as may be proper.

Dated: March 7, 2007


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By:

  
\_\_\_\_\_  
Co-Counsel for the Debtors and Debtors in  
Possession

**Exhibit A**

1. A current CV.
2. A copy of all materials you considered or relied upon in drafting your expert report(s) submitted with respect to the lack of hazard issues ("Expert Report(s)").
3. Copies of any and all notes that exist concerning the substance or topic of your Expert Reports.
4. Any and all communications between you and any other expert retained or consulted by the Asbestos Property Damage Committee in connection with the Adjudication of Lack of Hazard issues as described in the 15<sup>th</sup> Omnibus Objections.